REMARKS

The Office has rejected claims 1-7 under 35 U.S.C. § 102(b) as being anticipated by Ross (US 5,666,525). Claims 22-30 are rejected under 35 U.S.C. § 102(b) as being anticipated by Pederson (5,864,843). Claims 8-21 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Ross (5,666,525) in view of Pederson (5,864,843).

Claim Amendment

Claim 30 has been amended to correct a typographical error.

Ross 102(b) Rejection Claims 1 -7

Ross does not show or suggest "distributing, in response to the join request, rows and one or more columns of the rows of the first table from the first storage module to the second storage module...." Ross teaches "a technique for efficiently joining multiple large tables in a database system with a processor using a small main memory." Ross further describes a technique which allows "each input table to be read only once ... for the entire join operation." (Col. 21, lines 22-24.) In Ross's system, a single processor and a single small main memory are used to perform a join operation. The single processor has, at all times, direct access to all of the data needed to perform the join operation. Moreover, the input tables in Ross's system are read only once during the entire process. The step of moving or distributing data from one storage module to another storage module simply is not taught by Ross, and in fact it can't be. Distributing data in this manner would require an extra data-move operation that would violate a basic teaching of Ross – i.e., it would require reading an input table more than once.

In describing an alternative embodiment of his system, Ross states that "the jive-join technique is easily adaptable to a distributed system." (Col. 21, lines 1-7.) In this embodiment, however, Ross does not show or suggest any type of data movement from one system to another. The requirement that an input table can only be read once for a join operation must also apply to this embodiment. Ross therefore does not show or suggest all the features of applicant's claims, and these claims are therefore allowable over the cited prior art.

Pederson 102(b) Rejection - Claims 22 - 30

Pederson does not show or suggest a "first access module adapted to further distribute row identifiers of the distributed rows ...." Applicant requires that the row identifiers for the distributed rows from the first table be distributed to the second access module. No where in Pederson is it taught that row identifiers are distributed. Furthermore, there is nothing in Pederson that would require knowledge of the row identifiers used by another access module. Therefore, Pederson does not show or suggest all the features of applicant's claims.

103(a) Rejection - Claims 8 -21

Applicant believes that any attempt to combine the Ross and Pederson patents is improper. One major feature of Ross's system is that each input table is read only once. Pederson, on the other hand, teaches a method that requires multiple reads of each input table (col. 6, lines 22-61), which violates this key feature of the Ross system. Ross therefore teaches away from the methods used by Pederson, and their combination is improper. A person of ordinary skill in the art would not seek to combine these references.

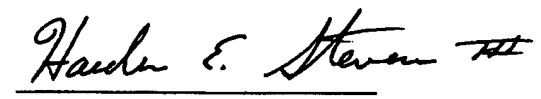
Even assuming that the Ross and Pederson references could be combined, the two still do not show or teach all the features of applicant's claims. The deficiencies pointed out in the discussion of Ross and Pederson above exist here as well.

CONCLUSION

None of the references cited, whether taken alone or in combination, shows or suggests the features of Applicant's claims. All of the claims are therefore allowable over these references.

Applicant asks the Examiner to reconsider this application and to allow all of the claims. Please apply any charges that might be due, excepting the issue fee but including fees for extensions of time, to deposit account 50-1673.

Respectfully,



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